



Northern Telecom Inc. Tel. (202) 347-4610

801 Pennsylvania Avenue, N.W.
Suite 700
Washington, DC 20004

June 1, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW - Room 222
Washington, D.C. 20554

RE: Ex Parte Presentation GEN Docket No. 90-314

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Pursuant to Section 1.1206 of the Commission's rules, this letter constitutes notification that David Twyver, President, Wireless Systems; Ron Cross, Director, Regulatory Policy Analysis; and the undersigned, all of Northern Telecom, met on May 31 with Chairman Reed Hundt and Karen Brinkmann; Commissioner Susan Ness and Gregory Vogt; Commissioner Rachelle Chong and Jill Luckett. The purpose of these meetings was to discuss Northern Telecom's views on issues in the referenced docket concerning Personal Communications Services (PCS). Specifically discussed was Northern Telecom's reaction to the band plan that was described in the trade and general press including the New York Times, the Wall Street Journal and Communications Daily as well as Motorola's ex parte filing in this same proceeding dated May 25, 1994. Also specifically discussed were Northern Telecom's views on the need for adequate power for licensed PCS; the desirability of allowing the industry to agree on standards for PCS; and the importance of the Commission adopting the complete WINForum spectrum etiquette plan for unlicensed PCS.

The views expressed at the meetings by Northern Telecom representatives are summarized as follows:

1. **Proposed New Band Plan:** Based on information disseminated in the media and in the ex parte presentation filed by Motorola on May 25 1994, Northern Telecom fully supports allocating for licensed PCS three 30 MHz and three 10 MHz blocks in the lower bands between 1850 and 1990 MHz. Northern Telecom believes that this configuration is significantly superior to the previous plan adopted by the Commission in its October 22, 1993 Report and Order. Grouping the licensed allocations in the lower bands will expedite the availability of PCS equipment at a lower cost than if the allocations were split between the upper and lower bands. Common base station and terminal equipment that spans the entire licensed and unlicensed bands can now be produced simplifying design, increasing volume and facilitating interoperability. Cost penalties associated with designing equipment for the

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upper band are eliminated and the tremendous complexities and costs of clearing the upper bands of incumbent microwave users are eliminated. The unlicensed industry can focus on clearing the 1910-1930 MHz band rather than dealing with the complexities of clearing a more encumbered band and interworking between the unlicensed band and all licensed bands is now practical. The 10 MHz bands are no longer relegated to niche applications. This will assure that Personal Communications Services are available to consumers sooner and more cost effectively, thus satisfying the needs of a broader customer base. In addition, Northern Telecom believes that the spectrum will be more highly valued under this configuration and could result in greater revenues from the auction process. Northern Telecom is ready to begin manufacturing PCS equipment in the U.S. as soon as the Commission adopts final rules.

2. Power for Licensed PCS: Northern Telecom believes that licensed PCS needs to be ensured adequate power in order to be competitive with already existing wireless services. Northern Telecom supports base station power levels of 1000 watts ERP and 1600 watts EIRP. These power levels will ensure a competitive playing field while providing incentives to minimize the power requirements of the PCS handset.

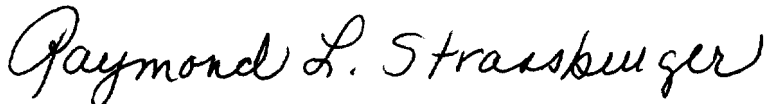
3. PCS Standards: Northern Telecom believes that standards are needed for the appropriate and effective operation of PCS. The Commission should permit and encourage the industry to continue its efforts to agree upon standards for PCS. The JTC and PCIA have already developed proposals that require manufactures to submit schedules and work plans for total standards adoption with submission of any proposed standard they wish considered. The industry, through the JTC, has been making excellent progress and already has reduced substantially from 16 to 7 the number of standards under active consideration. Further reductions are likely, but like cellular that has four standards, more than one will be adopted. The FCC should not require adoption of any ANSI-approved standard or standards as a precondition to type approval or deployment of PCS. Such a precondition could delay deployment of PCS for as much as several years which would be detrimental to the economy and potential providers and consumers of PCS. Furthermore, it is impractical to do technical or market tests of new services if standards must be adopted before their deployment. Service providers in a competitive marketplace are going to assure that consumers whose needs include roaming and interoperability are satisfied and are not going to risk alienation of consumers through premature retirement of equipment purchased by them.

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4. Adoption of WINForum Spectrum Etiquette: The spectrum etiquette adopted by WINForum and presented to the Commission by WINForum last year should be adopted by the Commission in its entirety. The WINForum plan represented a hard fought consensus among numerous industry experts who spent considerable time and resources in fashioning the plan.

An original and one copy of this filing are being transmitted as are copies to all the participants in the referenced meetings. In addition, a copy of this filing is being sent to Don Gips and Bruce Franca of the Commission's staff. Also attached is a copy of a chart which was provided to Commissioner Chong.

Sincerely,



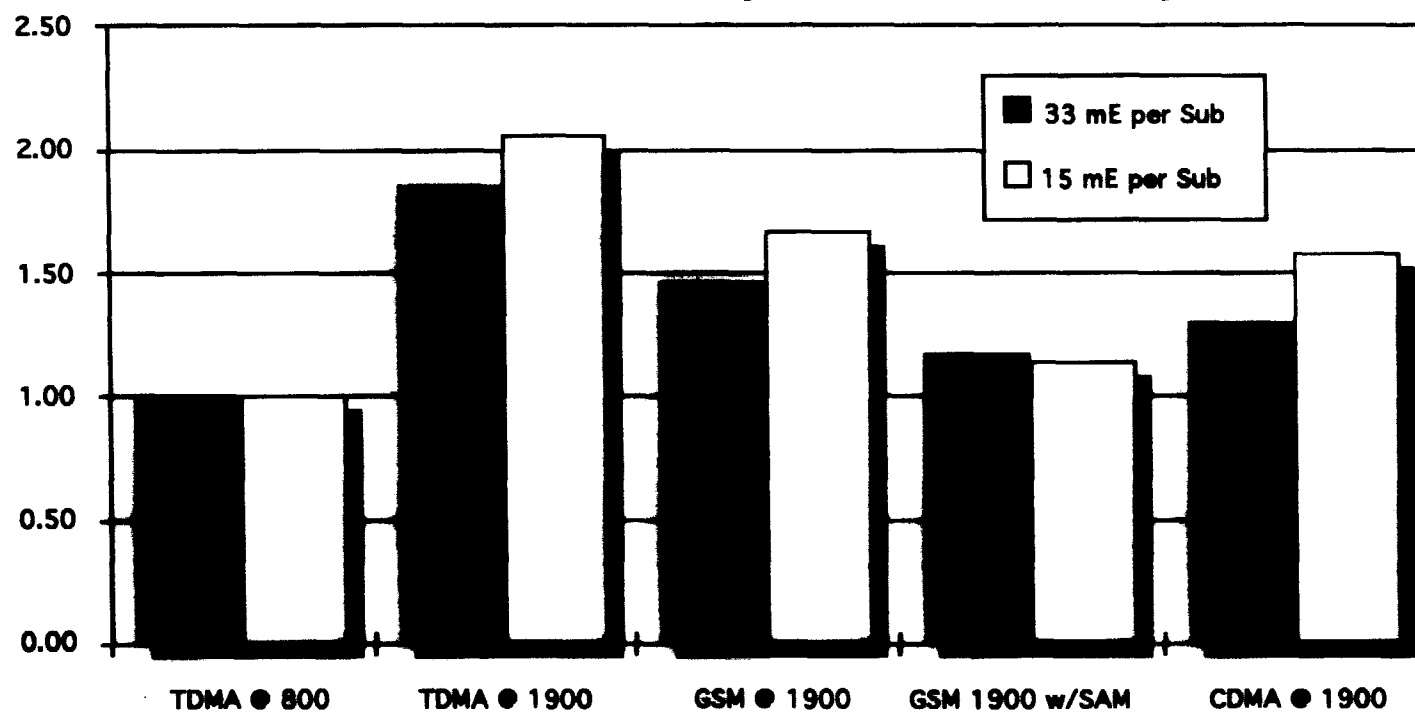
Raymond L. Strassburger
Director, Government Relations - Telecommunications Policy

RLS/gj
Attachments

cc: Chairman Reed Hundt, Karen Brinkmann
Commissioner Rachelle B. Chong, Jill M. Lockett
Commissioner Susan Ness, Gregory Vogt
Don Gips
Bruce Franca

PCS / Cellular Study

PCS vs. Cellular Total System Cost Summary:



• PCS Must Leverage Services and Increased Capacity to Compete